REMARKS

Claims 22-36 are pending.

The Examiner has rejected claims 22-36 under 35 U.S.C. § 103(a) as being unpatentable over King and Estrada. Applicant respectfully traverses this rejection.

> It is the Examiner's position that Estrada discloses a method in which when a writer does not locate the desired media that the user may create a spec for the desired element which is associated with the web page so that an artist can retrieve the spec and create the desired media based on the request (column 4, lines 5-40 and column 21, line 35-column 22, line 65 of Estrada).

(Office Action, April 1, 2005, pp. 2-3.) Applicant respectfully disagrees.

Estrada describes a technique for automatically generating an image for a document from "aesthetic parameters" (e.g., color, image, and font type) and text of the document. A graphics server generates and caches an image generated from the parameters and text and stores the parameters and text in a database. When the graphics server receives a request for the image (e.g., identified by a URL), the graphics server serves the image from the cache if it is still in the cache. Otherwise, the graphics server regenerates the image as follows:

> However, if that matching image is not found, the image must be regenerated. In step 385, the URL from the request is parsed to obtain the graphic parameters which, in step 386, are used to construct the graphics server objects, using default parameters for any necessary parameters missing from the URL. Then for each object constructed in step 386, in step 387 a background object is constructed, in step 388 the font object is constructed, in step 389 the text graphics are made, in step 390 graphic effects from the URL are applied, and in step 391 the background object is combined with the font, text, and effect objects to create the final image which in step 394 is written to cache.

(Estrada 22:41-53.)

Applicant respectfully requests clarification as to what in Estrada corresponds to the claimed "spec." Assuming, arguendo, that the Examiner believes the specifying of

parameters and an image corresponds to creating a spec, such creation is not performed "when the artist does not locate the desired media element," as recited, for example, in claim 22. Moreover, an artist does not "subsequently retrieve and use the spec to create the desired media element for the web page," as recited, for example, by claim 22. Rather, that spec is retrieved when the image is not found in the cache and a new image is generated by the graphics server, not an artist. Each of the independent claims recites language similar to the quoted language.

Based upon these remarks, applicant respectfully requests reconsideration of this application and its early allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-8548.

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Respectfully submitted,

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